

G O D D A R D L A W P L L C

39 Broadway, Suite 1540 | New York, NY 10006
Office. 646.964.1178
Fax. 212.208.2914
WWW.GODDARDLAWNYC.COM

April 25, 2024

BY ECF

Honorable John P. Cronan
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

**Re: Cuccia v. HF Management Services LLC d/b/a Healthfirst, Inc. et al.
1:24-cv-02091 (JPC)**

Dear Judge Cronan:

This firm represents Plaintiff Heather Cuccia (“Plaintiff”) in the above-referenced action. We write respectfully that this Court stay the deadline for Plaintiff to file her Complaint, currently set for May 1, 2024, pending the resolution of Plaintiff’s Motion to Remand (ECF Doc. No. 9). This is Plaintiff’s first request for such extension of time.

The extension is sought due to Plaintiff’s pending Motion to Remand filed on April 19, 2024, before this Court. On April 24, 2024, this Court entered an order (ECF Doc. No. 11) for Defendants to file their response to Plaintiff’s Motion to Remand by April 30, 2024. Therefore, the motion to remand is pending a response and a decision from this Court. The decision will affect whether the Plaintiff’s Complaint is filed in, and allowing the motion to be resolved before filing will conserve party resources by allowing the Plaintiff to draft said Complaint with the applicable standards in mind.

Defendants take no position on this request.

We thank the Court for its time and attention to this matter and its consideration of this request.

Respectfully submitted,

/s/ Megan S. Goddard
Megan S. Goddard, Esq.

The request is granted. The deadline for Plaintiff to file a complaint is adjourned *sine die*. The Clerk of Court is respectfully directed to close Docket Number 12.

SO ORDERED.

Date: April 26, 2024
New York, New York


JOHN P. CRONAN
United States District Judge